

December 8, 2017

Robert Menicocci,
Acting Agency Director
Santa Clara County Social Services Agency
333 West Julian Street, 5th Floor
San Jose, CA 95110

Dear Mr. Menicocci:

This letter is to advise you that the Corrective Action Plan submitted by Santa Clara County Social Services Agency on October 17, 2017 in response to the results of our 2016/17 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Daniel Cervantes (consultant) at (916) 654-0946. You may also contact your consultant by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

Original signed by Lee Macias

Lee Macias, Chief
Civil Rights Unit
Family Engagement and Empowerment Division

c: Tere Hayes, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
State Refugee Coordinator

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Andrew Riesenbergl
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

County of Santa Clara

Social Services Agency

333 W. Julian St.
San Jose, California 95110-2335
(408) 755-7298 (408) 755-7926 fax



10/17/17

Tiffany Marsh, Acting Chief
Civil Rights Bureau
Human Rights and Community Services Division
744 P Street
Sacramento, CA 95815

Subject: Civil Rights Compliance Review – Corrective Action Plan

Dear Ms. Marsh:

In response to the Civil Rights Compliance Review Report dated 7/21/17, attached is our Corrective Action Plan addressing the compliance issues (deficiencies) identified in the report. In responding, we used your report format by adding one additional column for our response.

Thank you and your staff for the cooperation and assistance provided during the Civil Rights Compliance Review. On a special note, I would like to express our appreciation to Daniel Cervantes, Civil Rights Program Consultant, for his valued assistance and guidance during the audit.

If there are any questions regarding our Corrective Action Plan, please contact Tere Hayes at (408) 755-7299; teresa.hayes@ceo.sccgov.org.

Sincerely,

Robert Menicocci
Agency Director

c: Debra Porchia-Usher, Chief Deputy Director of Operations, SSA
Denise Boland, Director of the Department of Employment and Benefits, SSA
Francesca LeRue, Director of Family and Children's Services, SSA
James Ramoni, Director of Aging and Adult Services
Tere Hayes, Civil Rights Coordinator, SSA



CIVIL RIGHTS COMPLIANCE REVIEW REPORT
CORRECTIVE ACTION PLAN
FOR
SANTA CLARA COUNTY
SOCIAL SERVICES AGENCY

10/17/17

Robert Menicocci, Agency Director
Debra Porchia-Usher, Chief Deputy Director of Operations
333 W. Julian Street
San Jose, CA 95110

Prepared by
Tere Hayes
Civil Rights Coordinator
333 W. Julian
San Jose, CA 95110
(408) 755-7299
teresa.hayes@ceo.sccgov.org

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Department of Employment and Benefit Services (DEBS)	1867 Senter Rd San Jose, CA 95112	CalFRESH CalWORKs	Spanish, Vietnamese
Department of Employment and Benefit Services (DEBS)	1870 Senter Rd San Jose, CA 95112	CalFRESH CalWORKs	Spanish, Vietnamese
Department of Employment and Benefit Services (DEBS)	1879 Senter Rd San Jose, CA 95112	CalWORKs CalWORKs Employment Services	Spanish, Vietnamese
In Home Supportive Services	1888 Senter Rd San Jose, CA 95112	IHSS	Spanish, Vietnamese
Children's Services	373 W Julian St, San Jose, CA 95110	Children's Services	Spanish, Vietnamese
Department of Employment and Benefit Services (DEBS)	379 Tomkins Ct. Gilroy, CA 95020	CalFRESH, CalWORKs, Children's Services	Spanish

RELEVANT FINDINGS ARE NOTED BELOW

III. DISSEMINATION OF INFORMATION

A. Findings

CDSS Findings				SSA Response
Access to Services, Information and	Yes	No	Comments	Completion or Expected Completion Date and

Outreach				Comments
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes		Workers make themselves available to clients upon request. Santa Clara County has staff available until 7pm or later depending on the client's needs. Several public services/benefits are available to everyone online.	In compliance
Can clients, including those with disabilities, access services when unable to go to the office?	Yes		See comments above. Services can be accessed at https://www.sccgov.org/site/ssa/Pages/ssa.aspx	In compliance
Does the county ensure the awareness of available services for individuals in remote areas?	Yes		The county has an extensive recruitment campaign via online/radio ads, social media, and other commercial advertising. They also send out mass mailings as a means of recruitment.	In compliance

CDSS Findings				SSA Response
Signage, posters, pamphlets	Yes	No	Comments	Completion or Expected Completion Date and Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 8/16)?	Yes			In compliance
Is the pamphlet distributed and explained to each	Yes		The PUB 13 pamphlet is given and explained as part of the intake and	In compliance

CDSS Findings				SSA Response
Signage, posters, pamphlets	Yes	No	Comments	Completion or Expected Completion Date and Comments
client at intake and re-certification?			annual recertification process.	
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes		All office lobbies visited had the PUB 13 prominently displayed in the office's threshold languages. Other languages/versions of the PUB 13 were readily available at the reception window.	In compliance
Is the Pub 13 available in large print (English and Spanish), CD, and Braille?	Yes		See comments above.	In compliance
Were the current versions of the required posters present in the lobbies?	Yes		All PUB 13s were the most recent versions. All versions of the Pub 86 and AD 475B were also current.	In compliance
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate		No	Many signs throughout the county offices were not translated. All directional/informational signage must be in all threshold languages.	Several signs were identified for translation (see Attachment A) and translation and placement has been initiated. The Civil Rights Coordinator and departmental designees will periodically inspect facilities to ensure any new signs are properly translated. Additionally, a

CDSS Findings				SSA Response
Signage, posters, pamphlets	Yes	No	Comments	Completion or Expected Completion Date and Comments
languages?				memorandum summarizing audit findings and the need for translation of signs was distributed to all staff on 10/13/17.

B. Corrective Actions

Informational Element	Corrective Action Required	County Response
Directional and Instructional signage	Santa Clara County shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. Div. 21-107.212	Several signs were identified for translation (see Attachment A) and translation and placement has been initiated. The Civil Rights Coordinator and departmental designees will periodically inspect facilities to ensure any new signs are properly translated.

C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	08/16
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/15

Contact the Civil Rights Unit to receive the most recent versions, or download the Pub 13 from the CRB website <http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

County Response: The County of Santa Clara has posted updated posters in all facilities. *The County is still awaiting 10 updated Braille versions of PUB 13, requested from CDSS.*

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

A. Findings and Corrective Actions

1. Facility Location: 1867 Senter Rd, San Jose, CA 95112

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
Restroom	<p>Men's: Door pressure to open restroom door excessive at 13 lbs.</p> <p>Woman's: Door pressure to open restroom door excessive at 15 lbs.</p>	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 221	Completed as of 10/02/17.
Client lobby	<p>ADA accessible counter not compliant.</p> <p>Any counter that is offered as ADA compliant for people with wheelchairs must meet the requirements to the right.</p>	<p>The tops of dining surfaces and work surfaces shall be 28" min. and 34" max. above the finish floor or ground. (CA T24 11B.902.3) (ADA 902.3) pg. 316</p> <p>A portion of the counter surface that is 36" long min. and 34" high max. above the finish floor or ground shall be provided. (CA T24 11B-904.4.2) (ADA 904.4.2) pg. 323</p> <p>Knee and toe space complying with Section 32, Clear Floor or Ground Space for Wheelchairs shall be provided under the counter. (CA T24 11B-</p>	In progress. Replacement counter requires custom milling.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
		<p>904.4.2) (ADA 904.4.2) pg. 323</p> <p>A clear floor or ground space complying with Section 32, Clear Floor or Ground space for Wheelchairs shall be positioned for a forward approach to the counter. (CA T24 11B-904.4.2) (ADA 904.4.2) pg. 323</p>	

2. Facility Location: 1870 Senter Rd., San Jose, CA 95112

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
Client lobby	<p>ADA accessible counter not compliant.</p> <p>Any counter that is offered as ADA compliant for people with wheelchairs must meet the requirements to the right.</p>	<p>The tops of dining surfaces and work surfaces shall be 28" min. and 34" max. above the finish floor or ground. (CA T24 11B.902.3) (ADA 902.3) pg. 316</p> <p>A portion of the counter surface that is 36" long min. and 34" high max. above the finish floor or ground shall be provided. (CA T24 11B-904.4.2) (ADA 904.4.2) pg. 323</p> <p>Knee and toe space complying with Section 32, Clear Floor or Ground Space for Wheelchairs shall be provided under the counter (CA T24 11B-904.4.2)</p>	In progress. Checking warehouse for matching furniture.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
		(ADA 904.4.2) pg. 323 A clear floor or ground space complying with Section 32, Clear Floor or Ground space for Wheelchairs shall be positioned for a forward approach to the counter (CA T24 11B-904.4.2) (ADA 904.4.2) pg. 323	

3. Facility Location: 1879 Senter Rd., San Jose, CA 95112

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
Restroom	Woman's: Door pressure to open restroom door excessive at 16 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 221	Completed as of 10/02/17.

4. Facility Location: 1888 Senter Rd., San Jose, CA 95112

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
Restroom	Men's: Door pressure to open restroom door excessive at 17 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 221	Completed as of 10/02/17.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
	Woman's: Door pressure to open restroom door excessive at 18 lbs.		

5. **Facility Location:** 373 W Julian St., San Jose, CA 95110

No findings at this location.

6. **Facility Location:** 379 Tomkins Ct., Gilroy, CA 95020

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
Restroom	Men's: (downstairs) Soap dispenser too high at 42.5 inches. Woman's (downstairs): Soap dispenser too high at 49.5 inches. Woman's (upstairs): Soap dispenser too high at 49.5 inches. Men's: (downstairs)	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg. 382 All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg. 382	Completed as of 10/02/17.

CDSS Findings			SSA Response
Facility Element	Findings	Corrective Action	Completion or Expected Completion Date and Comments
	Soap dispenser too high at 50 inches		

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
Does the county identify a client's language need upon first contact? How?		No	Priority seemed to be given to shortening the line/wait times, rather than identifying primary language.	Language service telephones with dual handsets have been ordered for lobby windows and greeter stations. Additionally, SCD 2334 ("We Speak Your Language") signs have been revised and made available to all public contact employees with instructions for their use in agency/ department-wide memos and agency's Common Place Handbook – Civil Rights chapter (See Attachment B).
Does the county use a primary language form?		No	In the cases reviewed, there were some inconsistencies with the use of the county's language preference form; Form SCD 1264. Of the case files with the form, half were completely and properly filled	Relevant sections of the agency's Common Place Handbook – Civil Rights chapter have been revised to remind employees of the use of SCD 1264 and the need

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
			out. Further, it was discovered that the county's language preference form is available in 27 different languages. When reviewing case files, the form was found in English and Spanish only.	to use the form which corresponds to the preferred language of the user (See Attachment B). Agency/Department-wide memos have been issued to remind and instruct employees on the use of language designation forms (See Attachment B).
Does the client self-declare on this form?	Yes		The client is responsible for filling out the form and signing. In the case files with the language preference form, only half had the form filled out.	In compliance
Are non-English- or limited- English-speaking clients provided bilingual services?	Yes		Interpretive services are provided via certified bilingual staff. Telephone interpreters are provided via Voiance Language Services, their contracted telephone interpretive service.	In compliance
After it has been determined that the client is Limited-English or non-English speaking, is there a county process for procuring an interpreter?	Yes		The client's language is determined early on to ensure effective communication. When possible, clients are assigned a bilingual case worker in their preferred language. Further, some workers have access to a phone with dual headsets that allows the client and social worker to be on the phone simultaneously with the Voiance Language Services worker or any other certified	In compliance

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
			interpreter within Santa Clara County.	
Does the county have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes		Santa Clara County uses Voiance Language Services as their contracted phone interpretive service.	In compliance
Is there a delay in providing interpretive services?	Yes		When observing in the different lobbies, first contact staff were not always prepared to offer services to the client. Some mentioned that they'd never used the county's language line.	In compliance
Are county interpreters certified?	Yes		Santa Clara County bilingual staff must be certified by the county to provide interpretive services to the public.	In compliance
Does the county have adequate interpreter services?	Yes			In compliance
Does the county allow minors to be interpreters? If so, under what circumstances?		No	Applicants/recipients are prohibited from using minors as interpreters except under extenuating circumstances, such as determining the language of the adult so an appropriate interpreter or bilingual staff can be called.	In compliance
Does the county	Yes		Clients are first offered free	In compliance

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
allow the client to provide his or her own interpreter?			county interpretive services. The option of using their own interpreter is then presented.	
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes		Santa Clara requires form SC 2326 to be signed if a client prefers to use their own interpreter. None were found during the review.	In compliance
Does the county use a Release of Confidentiality Information form for client-provided interpreters?	Yes		See comments above.	In compliance
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?			n/a	
Does the county use the CDSS-translated forms in the clients' primary languages?	Yes		Forms found in the case files were distributed in the client's preferred language.	In compliance
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes			In compliance

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes		Several uncommon languages were reviewed. In all cases, the worker ensured that the client understood the information being provide. The first way is to ensure someone in the household, typically an Authorized Representative being able to translate the form. The second way is to provide information in the client's preferred language instructing them to call the office if they had questions about the information they are receiving.	In compliance
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	Yes		Auxiliary aids are available upon request.	In compliance
Does the county identify a client with a disability (physical, mental, or learning)?	Yes		Clients are always offered reasonable accommodation upon contact. The county also uses an identifying system that allows case workers to see immediately should a client's case be a special needs case.	In compliance

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
			<p>The gray check means no active special accommodations.</p> <p>The yellow triangle means one or more active special accommodations.</p> <p>The red indicator means one or more active sensitive information items.</p> <p>Clients can also disclose the information on their own.</p>	
Does the county assist clients with self-identifying a disability?	Yes		See comments above.	In compliance
Does the county have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes			In compliance
Does the county offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes		Santa Clara County staff contact the Equal Opportunity Office for assistance in these accommodations. Further, they use technology, web based services, and other means of communication to ensure a client's needs are met. They also contract with local agencies to assist in determining and accommodating clients.	In compliance
Does the county	Yes		A review form titled "Need	In compliance

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
identify and assist the client who has learning disabilities or a client who cannot read or write?			Additional Assistance” (SCD 2371) for special accommodations is to be used by the EW/Worker to obtain information pertaining to any additional help requested by the client due to a disability (physical, mental/emotional or learning), or other type of accommodation. The form functions as a triage form, soliciting responses to various questions. It should be made clear to clients that whether or not they disclose a disability is voluntary and they can always choose to disclose a disability, or request for a special accommodation, at a later time. If client discloses a disability during any first contact with any employee, the employee must immediately share the information with appropriate staff, who can take steps to explore a reasonable accommodation.	
Does the county offer a screening for learning disabilities?	Yes		See comments above.	In compliance
Is there an established process for offering a screening?	Yes		Staff have an obligation to determine whether client needs additional assistance due to a disability and to reach out to help them establish eligibility or maintain public benefits. When determining	In compliance

CDSS Findings				SSA Response
Questions	Yes	No	Comments	Completion or Expected Completion Date and Comments
			what reasonable accommodation to provide, staff must consider what the client expresses will best meet their needs and information from treating medical providers should be given consideration. For example, if client needs help completing the forms because he/she is illiterate as a result of a learning disability and does not understand the forms, the worker will assist the individual to complete the forms.	
Is the client identified as having a learning disability referred for an evaluation?	Yes		See comments above.	In compliance

B. Corrective Actions

CDSS Findings		SSA Response
Area of Findings	Corrective Action	Completion or Expected Completion Date and Comments
Effective Services	Santa Clara County must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities. Div. 21-115	Language service telephones with dual handsets have been ordered for lobby windows and greeter stations. Additionally, SCD 2334 ("We Speak Your Language") signs have been revised and made available to all public contact employees with instructions for their use in

CDSS Findings		SSA Response
Area of Findings	Corrective Action	Completion or Expected Completion Date and Comments
		agency/department-wide memos and agency's Common Place Handbook – Civil Rights chapter.
Timely Services	Santa Clara County must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115	See above.
Interpretive Services and Accessibility	Santa Clara County shall ensure that administrative practices do not have the effect of denying non-English speaking persons and individuals with disabilities equal access to and participation in the available programs and activities. Div. 21-115.3	See above. Civil Rights Coordinator will monitor periodically to ensure compliance and provide training where necessary.

a. Recommendation

During the review, several offices and several cubicles had a Voiance Language Services poster suggesting that the county can help the client in their preferred language. Oftentimes, the poster was not in plain sight thus making it difficult for county staff to effectively use the poster. In the offices that had multiple windows to service clients, there were only 1 or 2 posters for all of the windows. It would benefit both the county and the client to have those posters prominently displayed at each service window. This poster can assist Santa Clara staff in determining a client's preferred language upon contact.

County Response: Language service telephones with dual handsets have been ordered for lobby windows and greeter stations. Additionally, SCD 2334 ("We Speak Your Language") signs have been revised and made available to all public contact employees with instructions for their use in agency and department-wide memos and the agency's Common Place Handbook – Civil Rights chapter.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

A. Findings from Case File Reviews and Staff Interviews

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services, Foster Care, and/or Kingap
Ethnic origin documentation	SCD 1265 CMIPS	SCD 1265	SCD 1265	SCD 1265	SCD 1265
Method of identifying client's primary language	SCD 1265	SCD 1265 SAWS1	SCD 1265	SCD 1265	SCD 1265 CWS/CMS
Method of documenting client's primary language	CMIPS	CalWIN Case Narrative	CalWIN Case Narrative	Case Narrative	CWS/CMS Case Narrative
Method of providing bilingual services and documentation	SCD 1265 CMIPS	SCD 1265 Case Narrative	SCD 1265 Case Narrative	Case Narrative	CWS/CMS Case Narrative
Client provided own interpreter	SCD 2326 CMIPS	SCD 2326 Case Narrative	SCD 2326 Case Narrative None Found	SCD 2326 None Found None Found	SCD 2326 CWS/CMS Case Narrative None Found
Method to inform client of potential problem using own interpreter	SCD 2326	SCD 2326	SCD 2326 None Found	SCD 2326 None Found	SCD 2326 None Found
Release of information to Interpreter	SCD 2326 None found in case files	SCD 2326 None found in case files	SCD 2326 None found in case files	SCD 2326 None found in case files	SCD 2326 None found in case files

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services, Foster Care, and/or Kingap
Individual's acceptance or refusal of written material offered in primary language	SCD 1265 Case Narrative	SCD 1265 Case Narrative	SCD 1265 Case Narrative	SCD 1265 Case Narrative	SCD 1265 Case Narrative
Documentation of minor used as interpreter	Minors not used	Minors not used	Minors not used	Minors not used	Minors not used
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A	N/A	N/A
Method of identifying client's disability	CMIPS Case narrative	CalWIN case flag	CalWIN case flag	Case Narrative None found in case files	CWS/CMS Case Narrative None found in case files
Method of documenting clients' disability (physical, mental, or learning)	CMIPS Case narrative	CalWIN case flag Case narrative	CalWIN case flag Case narrative	Case Narrative None found in case files	CWS/CMS Case Narrative None found in case files
Method of offering a reasonable accommodation to the client with disability	CMIPS Case narrative	CalWIN case flag Case narrative	CalWIN case flag Case narrative	Case Narrative None found in case files	CWS/CMS Case Narrative None found in case files

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services, Foster Care, and/or Kingap
Method of documenting clients' reasonable accommodation	CMIPS Case narrative	CalWIN case flag Case narrative	CalWIN case flag Case narrative	Case Narrative None found in case files	CWS/CMS Case Narrative None found in case files

B. Corrective Actions

CDSS Findings		SSA Response
Area of Action	Corrective Action	Completion or Expected Completion Date and Comments
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23	Instruction on the use of form SCD 2362 (Certification of Confidentiality) was issued in agency and department-wide memos. Instructions are also included in the Agency's Common Place Handbook – civil rights chapter (See Attachment C) .
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24	Instruction on the use of form SCD 2362 (Certification of Confidentiality) was issued in agency and department-wide memos. Instructions are also included in the Agency's Common Place Handbook – civil rights chapter (See Attachment C) .
Documentation of primary language	Each agency shall ensure that case record identification shows the	Relevant sections of the agency's Common Place Handbook – Civil Rights

CDSS Findings		SSA Response
Area of Action	Corrective Action	Completion or Expected Completion Date and Comments
	applicant's/recipient's ethnic origin and primary language. Div. 21-201.21	chapter have been revised to remind employees of the use of SCD 1264 and the need to use the form which corresponds to the preferred language of the user (See Attachment B) . Agency/Department-wide memos have been issued to remind and instruct employees on the use of language designation forms (See Attachment B) .
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22	Agency/Department-wide reminders regarding the need and format for provision of bilingual services have been issued.
General	Santa Clara County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116	See above.

VII. STAFF DEVELOPMENT AND TRAINING

A. Findings

Interview questions	Yes	No	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes		Staff are regularly trained and reminded of Division 21 requirements.

Interview questions	Yes	No	Comments
Do employees receive continued Division 21 Training?	Yes		Training is mandatory for all social services employees, to be completed every 2 years
Do employees understand the county policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes		Everyone interviewed knew the process of informing their supervisor and/or the Civil Rights Coordinator.
Does the county provide employees Cultural Awareness Training?	Yes		Training is mandatory for all social services employees, to be completed every 2 years
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes		Professional Development Opportunities for Social Workers in Child Welfare listed on the Agency web page are offered throughout the year.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes		Regular training in Santa Clara County help keep staff reminded of the importance of the service they provide to the public.
Does the county provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes		County staff commence their employment with the county with a 6-month induction training that includes this training.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes		See comments above
Do the employees understand the county policy regarding a client's right to a reasonable accommodation?	Yes		All staff interviewed understood the importance of client rights related to reasonable accommodation.

B. Corrective Actions

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes		All staff interviewed were aware of the procedure Santa Clara County has ensure valid discrimination complaints are identified and communicated to the Civil Rights Coordinator.
Do the employees know who the Civil Rights Coordinator is?	Yes		
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (Pub 86)" with information as to how and where the clients can file a discrimination complaint?		No	Although county staff was aware of who the Civil Rights Coordinator is, they did not know where her information was located in the front lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes		

B. Corrective Action

CDSS Findings		SSA Response
Element	Corrective Action	Completion or Expected Completion Date and Comments
Civil Rights Coordinator	Santa Clara County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located.	Agency-wide memo has been issued reminding employees of Civil Rights Coordinator contact information and location of PUB 86.

CDSS Findings		SSA Response
Element	Corrective Action	Completion or Expected Completion Date and Comments
	Div. 21-117 and 21-107.21	

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	10
Number of Contracts w/Assurance of Compliance Agreement	10

B. Corrective Action

None